

Law Offices

# HOLLAND & KNIGHT LLP

2100 Pennsylvania Avenue, N.W.  
Suite 400  
Washington, D.C. 20037-3202

202-955-3000  
FAX 202-955-5564  
www.hklaw.com

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August 9, 1999

THOMAS J. HUTTON  
202-828-1892

Internet Address:  
thutton@hklaw.com

## VIA HAND DELIVERY

Magalie R. Salas, Esq.  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W.  
Room TW-A325  
Washington, DC 20554

RECEIVED  
AUG 9 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Reading Broadcasting, Inc.  
MM Docket No. 99-152

Dear Ms. Salas:

Submitted on behalf of Reading Broadcasting, Inc. are the original and six copies of the "Response of Reading Broadcasting, Inc. to Adams' First Set of Interrogatories." The attached signature page is a facsimile, and the original signature page will be submitted as an addendum.

Sincerely,

HOLLAND & KNIGHT LLP

*Thomas J. Hutton*  
THOMAS J. HUTTON

Enclosure

cc(w/encl.): Certificate of Service

CORRESPONDENCE  
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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

In re Applications of

READING BROADCASTING, INC.

For Renewal of License of  
 Station WTVE(TV), Channel 51  
 Reading, Pennsylvania

and

ADAMS COMMUNICATIONS CORPORATION

For Construction Permit

MM Docket No. 99-153

File No. BRCT-940407KF

File No. BPCT-940630KG

To: Administrative Law Judge Richard L. Sippel

**RESPONSE OF READING BROADCASTING, INC., TO  
 ADAMS' FIRST SET OF INTERROGATORIES**

Reading Broadcasting, Inc. ("RBI"), acting through its attorneys, herewith responds to Adams' *First Set of Interrogatories*, propounded in this proceeding on or about July 19, 1999.

*Interrogatory 1:* Identify all persons who were employed or otherwise involved in the operation of Station WTVE(TV), Channel 51, Reading, Pennsylvania ("the Station") at any time during the period commencing February 10, 1992, and ending August 1, 1994.

*Response to Interrogatory:* RBI reasonably interprets this *Interrogatory* to request the identities of employees, officers and directors of RBI. Otherwise, the term "otherwise involved" could have such a broad definition as to defy any reasonable answer, including employees of vendors who provided goods and services to RBI which enabled it to continue to operate. Likewise, the

definition could encompass identifying the many shareholders of RBI during the period, who voted annually at meetings to elect directors.

All addresses indicated are the present addresses of the persons indicated, unless the name is followed by an asterisk. In such a case, the address indicated is the last address which RBI possesses for the person listed:

*Directors:*

Irvin Cohen 1505 Lorraine Road Reading, PA 19606	Robert Clymer, M.D. 7 High Road Wyomissing, PA 19610
Hon. C. Myron Rose 2401 Pennsylvania Ave. Apartment 3B-241 Philadelphia, PA 19130	Rev. Frank McCracken 1716 North 3 <sup>rd</sup> Street Reading, PA 19601
	Micheal L. Parker 22720 S.E. 410th Street Enumclaw, WA 98022
Alfred W. Busby 505 Mt. Creek Terrace Atlanta, Georgia 30328	Lawrence Rogow 5670 Wilshire Boulevard Suite 1300 Los Angeles, California 90036

*Officers:*

Micheal L. Parker, President

H. Marvin Mercer III, Esq., Secretary \*

17 South Church Street  
West Chester, PA 19382

Linda L. Hendrickson, Vice president

16714 92nd Avenue Court East  
Puyallup, WA 98373

*Employees:*

Daniel E. Bendetti, 749 North 12<sup>th</sup> Street, Reading, PA 19604\*

Kimberley Bradley, 2008 Reservoir Road, Reading, PA 19604

Gregory Brisson, 8 Spring Lake Drive, West Harrison, NY 10604\*

Christine Weyandt, 3209 Noble Street, Reading, PA 19605

Alfred Craig, 101 S. 3<sup>rd</sup> Street, Reading, PA 19602\*

Richard C. Frantz, 2402 McKinley Ave., West Lawn, PA 19609\*

Robert L. Johnson, 7942 Rugby Street, Philadelphia, PA 19150\*

-- Response to Interrogatories, Page 2 --

Joseph M. Harmuth, 2011 Frontier Ave., Reading, PA 19601\*  
 Theresa M. Manento, 721 Frost Hollow Rd., Easton, PA 18040\*  
 George A. Mattmiller, Jr., 10053 Madison Ave., Reading, PA 19601  
 Roberta J. Nye, 3113 Pricetown Road, Temple, PA 19560  
 Samuel Ndungu, 1115 Marion St., Reading, PA 19604\*  
 Richard Quaglia, 201 East Lancaster Ave., Shillington, PA 19611\*  
 Samuel A. Stichter, 213 McClellan Street, Reading, PA 19604\*  
 Daniel Vitalo, 2128 Fairview St., West Lawn, PA 19609  
 Kenneth Warmkessel, 2 Butter Lane, Mohnton, PA 19540\*  
 Barbara L. Williamson, 30 Daniel Dr., Mohrsville, PA 19541  
 Gibson P. White, R.D. #2, Box 12819, Hummelstown, PA 17036  
 Rochelle A. Bendetti, 749 N. 12<sup>th</sup> St., Reading, PA 19604\*  
 Jeffrey A. Dengler, 305D Main St., Oley, PA 19547\*  
 Mcvalimu Benjamin, 740 N. 2d St., Reading, PA 19601\*  
 David Kase, 736 Thorn Street, Reading, PA 19601  
 Michael Weslowsky, 277 N. Galen Hall Rd., Wernersville, PA 19565\*  
 Damon B. Casantini, 929 High Blvd., Reading, PA 19607  
 Amy L. Ortiz, 234 S. 5<sup>th</sup> St., Reading, PA 19602\*  
 Robert D. McCarty, R.D. 3, Box 3240, Mohnton, PA 19540\*  
 Timothy J. McLain, 500 Elderberry Dr., Reading, PA 19606\*  
 Loren Meck, 116 Ponderosa Dr., Blandon, PA 19510\*  
 Kristine A. Marino, 810 N. 5<sup>th</sup> St., Reading, PA 19601\*

*Interrogatory 2:* Identify all persons, other than those identified in response to *Interrogatory No. 1*, who are known to RBI or believed by RBI to have knowledge of the programming of the Station during the period commencing February 10, 1992, and ending August 1, 1994.

*Response to Interrogatory:* RBI reasonably interprets this *Interrogatory* to request the identities of persons who may be relied upon by RBI as public witnesses in the hearing planned for this proceeding. Otherwise, the phrase "known... or believed by RBI to have knowledge of the programming of the Station during the period..." could include all potential viewers, and would be so broad as to defy any reasonable answer.

In most cases, the response contained herein is incomplete. RBI will supplement this response with names of individuals (where none is indicated) and addresses within a short period.

-- Response to Interrogatories, Page 3 --

Berks County Poison Control Center

George Arnold, Speech Therapist  
Berks County Intermediate Unit

Berks Chapter, American Red Cross

St. Joseph Hospital

American Cancer Society

Berks AIDS

Concern

Humane Society of Berks County  
1801 North 11<sup>th</sup> Street  
Reading, PA 19604

Berks Conservancy

Berks Conservation District

Schuylkill River Greenway

Berks Recycling Coalition

Berks 4-H Program

Pennsylvania Environmental Council

Pennsylvania Dept. of Transportation

Berks County Historical Society

Berks County Services Center

National Multiple Sclerosis Society

Berks Chapter

National Council on Alcoholism

Marine Reserve Unit

Pennsylvania Bureau on Charitable

### Organizations

Children's Rights of Pennsylvania, Inc.

Veterans Services Unit - Berks County

Job Center

Help the Homeless

Health Association of Southeastern  
Pennsylvania

Reading Public Museum

Pennsylvania Special Olympics

Habitat for Humanity

American Lung Association

Berks County Chapter  
Mothers Against Drunk Driving

National Easter Seal Society

United States Postal Service

National Arbor Day Federation

St. James Chapel  
Church of God in Christ

Police Athletic League

Neighbor Works

Pennsylvania Air National Guard  
Keystone Safety Belt Network

Burn Foundation of North/Northeastern  
Pennsylvania

Reading Marketing Association

-- Response to Interrogatories, Page 4 --

Reading Buccaneers Drum and Bugle Corps	Berks County Chapter United Way
St. Johns Christian Academy	Berks County Center for Independent Living
Pennsylvania Crime Stoppers	United States Marines Toys for Tots
D.A.R.E.	Police Labor Organization Township of Spring
Hopewell Furnace National Historical Site	Camp Adahi
Kutztown Crisis/Pregnancy Center	Reading Aerofest
Reading Lions & Lionesses Club	Duryea Days - Boyerstown Museum of Historic Vehicles
Berks County Chapter NAACP	Scenic River Days
Big Brothers Big Sisters of Berks County	Rodale Institute
Pennsylvania Wild Resource Conservation Fund	Working for a Greater Reading
Hodgerow Theater	Reading Phillies Daryl Givgnm Charitable Game
Franklin Institute	Doug Didyoung POW/MIA Forget Me Not
Pennsylvania Academy of Fine Arts	West Lawn Fire Company
Berks County Literacy Coalition	Pennsylvania Council of Trout Unlimited
Mid-Atlantic Air Museum	Beth Sitter, Director Berks County Senior Citizens Council
March of Dimes	Berks County Lupus Support Group
Berks County YWCA	Community General Hospital
Animal Rescue League	Hawk Mountain Council Learning for Life
St. John's United Church of Christ	Switchback Gravity Railway Foundation
Keystone State Games	Reading Rehabilitation Hospital
Reading Musical Foundation	
Berks Visitors Information Association	

-- Response to Interrogatories, Page 5 --

Berks County Office of Aging	Reading Fire Department
Horizon Center	Reading Public Schools
Kutztown Senior Neighborhood Center	Schuylkill Conversation District
Mifflin Senior Neighborhood Center	Dante Santoni, Jr.
Hamburg Senior Neighborhood Center	Hogar Crea
Temple Association for Retired Professionals	Pennsylvania State Police
Conrad Weiser Homestead	Berks County Chapter UNICEF
Reading Company Technical and Historical Council	Aaron Lopez, Publisher <i>El Hispanico</i> newspaper
Reading Urban Ministry Family Action Support	Senator Chip Brighthill
Lehigh Valley A.I.S	Steve Whitney
Reading Hospital	Jane Meek
Berks County Vietnam Memorial	Mike O'Pake
Berks Women in Crisis	Greater Berks Food Bank
Berks County Mental Health Agency	Salvation Army
Berks County Deaf and Hard-of-Hearing Services	Albright College
Reading Beautification Organization	Alvernia College
"Take 3" High School Counselors	Reading Police Department
Kutztown Folk Festival	Ron Rouse, Publisher The "M" Voice
Kutztown University	Diabetes Foundation of Berks County
Reading Bureau of Recreation	Neighborhood Housing Service, Inc.
Reading Nursing Association	Berks County Hispanic Center
Berks County Hispanic Center	Tim Holden

-- Response to Interrogatories, Page 6 --

Caron Foundation

Tom Caltigirone

The foregoing statements are true to the best of my personal knowledge. Executed under penalty of perjury under the laws of the United States.

READING BROADCASTING, INC.

August 9, 1999

By: 

Frank D. McCracken  
Executive Vice President

*Of counsel:*

Thomas J. Hutton, Esq.  
Randall W. Sifers, Esq.  
HOLLAND & KNIGHT LLP  
2100 Pennsylvania Ave., N.W.  
Suite 400  
Washington, DC 20037  
(202) 828-1892

-- Response to Interrogatories, Page 7 --



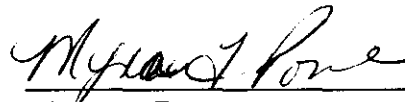
CERTIFICATE OF SERVICE

I, Myra Powe, a secretary in the law firm of Holland & Knight LLP do hereby certify that a copy of the foregoing Response of Reading Broadcasting, Inc. to Adams' First Set of Interrogatories was served, this 9<sup>th</sup> day of August 1999, via hand delivery, to the following:

The Hon. Richard L. Sippel  
Administrative Law Judge  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

James Shook, Esq.  
Mass Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Gene A. Bechtel, Esq.  
Henry F. Cole, Esq.  
Bechtel & Cole, Chartered  
1901 L Street, N.W.  
Suite 250  
Washington, D.C. 20036  
Counsel for Adams Communications Corporation

  
\_\_\_\_\_  
Myra F. Powe